

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

In re STELLENT, INC. SECURITIES
LITIGATION

This Document Relates To:

ALL ACTIONS.

) Master File No. CV-03-4384 RHK/AJB

)
) CLASS ACTION

) LEAD PLAINTIFFS' MOTION FOR
) FINAL APPROVAL OF SETTLEMENT
) AND PLAN OF ALLOCATION OF
) SETTLEMENT PROCEEDS AND
) APPLICATION FOR AN AWARD OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES

Lead Plaintiffs' motion is based on the Memorandum of Points and Authorities in Support of Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds, the Memorandum of Points and Authorities in Support of Application for an Award of Attorneys' Fees and Reimbursement of Expenses, the Affidavit of Dennis J. Herman in Support of Motion for: (1) Final Approval of Settlement; (2) Approval of the Plan of Allocation of Settlement Proceeds; and (3) Award of Attorneys' Fees and Reimbursement of Expenses, the declarations in support of application for attorneys' fees and reimbursement of expenses, the Affidavit of Christl Hansman Re A) Mailing of the Notice of Pendency and Proposed Settlement of Class Action, and the Proof of Claim and Release Form; and B) Publication of the Summary Notice, the Stipulation, all other pleadings and matters of record, and such additional evidence or argument as may be presented before or at the hearing.

DATED: November 8, 2005

Respectfully submitted,

REINHARDT WENDORF & BLANCHFIELD
GARRETT D. BLANCHFIELD, JR (#209855)

/s/ Garrett D. Blanchfield, Jr
GARRETT D. BLANCHFIELD, JR

E-1250 First National Bank Building
332 Minnesota Street
St. Paul, MN 55101
Telephone: 651/287-2100
651/287-2103 (fax)

Liaison Counsel

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
REED R. KATHREIN
DENNIS J. HERMAN
MARIA V. MORRIS
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
WILLIAM S. LERACH
JEFFREY D. LIGHT
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

LABATON SUCHAROW & RUDOFF LLP
CHRISTOPHER KELLER
LOUIS GOTTLIEB
100 Park Avenue, 12th Floor
New York, NY 10017-5563
Telephone: 212/907-0700
212/818-0477 (fax)

Attorneys for Lead Plaintiff David Mowbray

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